

**From:** [Moore, Gary](#)  
**To:** [Porter, Gary](#)  
**Cc:** [Werner, Robert](#); [Salinas, Amy](#)  
**Subject:** RE: CES  
**Date:** Friday, October 10, 2014 11:38:53 AM

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Did they just do that at PACES or at both PACES and CES?

Thanks

**Gary Moore**

**Federal On-Scene Coordinator**

**U.S. EPA Region 6**

**214-789-1627 cell**

**214-665-6609 office**

[moore.gary@epa.gov](mailto:moore.gary@epa.gov)

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**From:** Porter, Gary

**Sent:** Friday, October 10, 2014 9:44 AM

**To:** Moore, Gary

**Subject:** Re: CES

FYI-paces/ces declared bankruptcy they rented to companies named CRT and Progressive Chemical Technology. Those companies involved the same names of people as ces and paces but slightly shuffled, but the main focus was to continue the CITGO Lake Charles caustic to paper mills and some employees called the process the Raz Gas project.

Regards,

Gary Porter

Special Agent

EPA - CID

1919 Smith Street, Suite 925

Houston, Texas 77002

713-209-4896 office

713-245-6825 cell

On Oct 10, 2014, at 8:19 AM, "Moore, Gary" <[Moore.Gary@epa.gov](mailto:Moore.Gary@epa.gov)> wrote:

Any records in the files that document the Citgo and CES or paces relationship?

Sent from my iPhone

On Oct 10, 2014, at 7:40 AM, "Porter, Gary" <[Porter.Gary@epa.gov](mailto:Porter.Gary@epa.gov)> wrote:

My recollection was CITGO-Lake Charles, LA. PACES was not a subcontractor to CES. PACES was owned by Matt Bowman same as CES. I also recall various types of caustic going to both CES and PACES. Some types were "spent caustic", "sulphidic caustic" and "phenolic caustic", it went by barge to PACES as well as by tanker truck.

I hope this information is helpful.

Regards,  
Gary Porter  
Special Agent  
EPA - CID  
1919 Smith Street, Suite 925  
Houston, Texas 77002  
713-209-4896 office  
713-245-6825 cell

On Oct 9, 2014, at 11:51 PM, "Moore, Gary"  
<[Moore.Gary@epa.gov](mailto:Moore.Gary@epa.gov)> wrote:

Gary  
See  
Message blow from TCEQ Attorney. Do you know  
anything about Citgo or other refinery involvement with  
CES?  
Gary Moore

Sent from my iPhone

Begin forwarded message:

**From:** Patricia Scott  
<[patricia.scott@tceq.texas.gov](mailto:patricia.scott@tceq.texas.gov)>  
**Date:** October 9, 2014 at 4:17:09 PM CDT  
**To:** "Moore, Gary"  
<[Moore.Gary@epa.gov](mailto:Moore.Gary@epa.gov)>, "Salinas, Amy"  
<[salinas.amy@epa.gov](mailto:salinas.amy@epa.gov)>  
**Cc:** "Werner, Robert"  
<[Werner.Robert@epa.gov](mailto:Werner.Robert@epa.gov)>  
**Subject: RE: CES**

Hi Gary,  
Citgo had a contractual relationship with CES  
where CES would take waste caustic from the  
refinery and the "recycle it" by selling it to the  
paper mills. Sometimes they took the caustic to  
PACES, CES's subcontractor and may have  
slightly adjusted the solution. This is the type of  
material that TCEQ removed from the tank  
trailers at PACES. The waste characterization  
analysis of tank 604 is very similar to waste in  
most of the tank trailers at PACES. CES had  
several similar contractual relationships with  
other refineries. I haven't been able to locate  
any manifest that indicates how the waste got  
from PACES to CES. I don't know which refinery  
it came from. I hoping that EPA's CID

investigation records has this information.

**Patricia J. Scott**

Staff Attorney, TCEQ, Office of Legal Services,  
Litigation Division,  
MC-175 P.O. Box 13087  
Austin, Texas 78711-3087  
Tel: (512) 239-0637  
Fax: (512) 239-3434

[Patricia.Scott@tceq.texas.gov](mailto:Patricia.Scott@tceq.texas.gov)

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**From:** Moore, Gary

[\[mailto:Moore.Gary@epa.gov\]](mailto:Moore.Gary@epa.gov)

**Sent:** Wednesday, October 08, 2014 5:22 PM

**To:** Patricia Scott; Salinas, Amy

**Cc:** Werner, Robert

**Subject:** Fw: CES

**Hello All:**

**The below email is from a former  
employee of CES that now works for an  
Environmental Company. He has been  
very helpful. I am sending this to you  
because he indicated Citgo Caustic and I  
am not sure we have located anything  
associated with Citgo. We may want to  
scour our records to see how they may or  
may not be involved.**

**Thanks**

**Gary Moore**

**Federal On-Scene Coordinator**

**U.S. EPA Region 6**

**214-789-1627 cell**

**214-665-6609 office**

**[moore.gary@epa.gov](mailto:moore.gary@epa.gov)**

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**From:** [gary@c4env.com](mailto:gary@c4env.com) <[gary@c4env.com](mailto:gary@c4env.com)>

**Sent:** Wednesday, October 8, 2014 3:02 PM

**To:** Moore, Gary; Mickey Edmondson

**Subject:** RE: CES

Hello Gary:

These results are not surprising for what  
we know is in the boxes. It is not  
consistent with that of the Houston facility  
that only processed non-haz and oily  
water. It my understanding that these  
boxes came from the Port Arthur plant as  
either Citgo's caustic or waste derived from

the processing of the Citgo waste.  
Thank You,  
Gary Brauckman



281-686-3352

----- Original Message -----

Subject: CES

From: "Moore, Gary"

<[Moore.Gary@epa.gov](mailto:Moore.Gary@epa.gov)>

Date: Wed, October 08, 2014

12:44 pm

To: Mickey Edmondson

<[environmental@usa.com](mailto:environmental@usa.com)>, "Gary Brauckman

([gary@c4env.com](mailto:gary@c4env.com))"

<[gary@c4env.com](mailto:gary@c4env.com)>

**Mickey/Gary:**

**Veolia got samples of each of the vac boxes and we are going to get hit significant surcharges for sulfur and sodium. These are their comments. Is this surprising to you based upon the operation of the facility?**

**Below is an update on the analysis.**

**Organic Liquid / VB633 - 3.3% sulfur and 6.5% sodium.**

**Organic Sludge, Flammable / VB639 - 4.3% sulfur and 3.34% sodium.**

**Organic Sludge / multiple boxes as follows:**

**VB25141 - 69.7% sulfur (rerun is 71.2% sulfur) and 0.9% Sodium.**

**VB281842 - 65.1% sulfur (rerun is 48.6%) and 0.7% sodium.**

**VB640 - 42.8% sulfur (rerun is 48.6%) and 1.45% sodium.**

**VB610 - 17.6 ppm Mercury.**

**VB618 - 3.18% sodium.**

**Gary Moore  
Federal On-Scene  
Coordinator  
U.S. EPA Region 6**

214-789-1627 cell  
214-665-6609 office  
[moore.gary@epa.gov](mailto:moore.gary@epa.gov)